Gross Communications Corporation
170 West Fairbanks Avenue
Winter Park, Florida 32789
Phone: (407) 647-5577
Fax: (407) 647-6495

wloq
ORLANDO
FM 103.1

July 20, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RE: Comments of Gross Communications Corporation
MM Docket Number 98-35

Dear Ms. Salas:

Transmitted herewith is an original and nine (9) copies of the Comments of Gross Communications Corporation to be associated with the above-referenced rulemaking proceeding.

Should there be any question regarding these Petition, please contact undersigned.

Sincerely,

John B. Gross

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	
	)	
Review of the	)	
Commission's Broadcast	)	MM Docket No. 98-35
Ownership Rules and Other	)	
Rules Adopted Pursuant to	)	
Section 202 of the Tele-	)	
communications Act of 1996	)	

TO: THE COMMISSION

COMMENTS OF
GROSS COMMUNICATIONS CORPORATION

Gross Communications Corporation ("Gross"), the licensee of WLOQ(FM), Orlando, Florida, hereby submits the following comments in response to the Notice of Inquiry ("NOI") released by the Federal Communications Commission ("FCC" or "Commission") on March 13, 1998 in the above-referenced rulemaking proceeding.

In the NOI, the Commission sought comment on potential modifications to the wide gamut of broadcast ownership rules that were modified by the passage of the Telecommunications Act of 1996. Specifically, in reviewing its rules, the Commission sought comment on the need to review the Local Radio Ownership Rule, which determines the number of broadcast stations in a local radio market. ¶ 23. See 47 C.F.R. §73.3555(d)(ii).

As discussed more fully below, Gross strongly urges the Commission to conduct a detailed study of the Local Radio Ownership rule. The current rule permits the inclusion of many more stations than those stations that actually are part of the market. Rather than only include those stations that are viable competitors for advertising revenue in the market, the current rule permits the

inclusion of stations that, at best, are marginal influences in the market.

However, since the current local ownership caps are based on the number of stations in the market, the result is that a large group owner is able to own more stations in the market than it would otherwise be permitted to if the radio market was based on other factors than solely the intersection of radio signals. Therefore, while the current rule encourages the concentration of ownership of the top-ranked stations in a limited number of licensees, Gross believes that the local ownership rule should be revised to only consider those stations that are economic competitors in the market.

Therefore, Gross urges the Commission to modify its rules to only permit the inclusion of those stations that place a primary service contour (1 mV/m for FM, 2 mV/m for AM) over the entire city limits of the principal city in the market.[1/] Since advertisers seek out those stations that offer a strong signal to the market, the inclusion of only these stations will ensure that stations located a long distance from the market, who do not actually compete in the market, are not included in the tabulation of the local market. It is only through this method that the Commission can ensure that the diversity and competition in a radio market is maintained. NOI, ¶ 4.

[1/] See 47 C.F.R. § 73.182(d) (making the primary service for AM stations the 2 mV/m contour for communities over 2,500 persons).

II. BACKGROUND

A. Gross Embodies the Diversity of Ownership and Competition that the Commission seeks to preserve.

Gross Communications Corporation has been the licensee of Station WLOQ(FM), Orlando, Florida since 1977. Gross is truly the embodiment of the local ownership and diversity that Commission is attempting to preserve.[2/]

Herbert P. Gross owns 51% of the licensee and serves as the President. His wife, Margaret Gross, serves as the assistant secretary and treasurer. Their older son, John B. Gross, owns 31.8%, and serves as Vice President and Chief Operating Officer. James M. Gross, the younger son, owns 17.2% of the licensee and serves as Vice President and General Sales Manager. The entire family lives in the area, and is active in the community. In fact, John Gross serves as a director of the Metropolitan Orlando Urban League, and actively promotes minority recruitment in the community through this affiliation. Clearly, the Gross family represents the goals that Chairman Kennard and Commissioner Tristani cite as necessary considerations in preserving the local radio ownership rules.

[2/] See Comments of Chairman Kennard and Commissioner Gloria Tristani accompanying the NOI in the instant proceeding. (rel. Mar. 13, 1998). Chairman Kennard stated that the Commission "must stay focused on the two key aspects of the public interest; promoting competition and promoting diversity." Commissioner Gloria Tristani stated that the Commission's "interest in promoting a diversity of voices and viewpoints can be satisfied only through a large number of separately-owned competitors in the market." Id.

B. Gross Competes with Large, Absentee Group Owners that Benefit from Loophole in the Ownership Rules.

On the other hand, the remaining viable radio stations in the Orlando market are owned by three large, absentee, group owners. Cox Radio, Inc., a subsidiary of Cox Enterprises, Inc., currently owns seven stations in the market, and has a pending application to swap an AM station for a FM station in the market. (BALH-980309GK) Chancellor currently owns 4 stations in the market, and Clear Channel owns 6 stations.

Each of these licensees were permitted to amass a large number of stations under Section 73.3555(a)(1) of the Commission's Rules. For example, in Cox's pending application mentioned above, the Multiple Ownership Study listed **72** stations in the market. See Exhibit 1. As a result, Cox is able to own eight commercial radio stations, not more than 5 of which are in the same service. 47 C.F.R. § 73.3555(a)(1)(i).

However, rather than 72 stations, most market analysts consider the number of stations that actively compete in the market somewhere between 17 and 29 stations. BIA, Inc. lists 30 stations in the market, but determined that 29 stations are actually viable competitors for advertising revenue. Duncan's American Radio lists only 27 stations, 23 of which are in the Orlando market. Finally, Miller, Kaplan, Arase & Co. lists only 18 stations that actively compete for advertising revenue. See Exhibit 2.

The great disparity between the number of stations that Cox listed, and the number of stations that actually compete in the market, can be explained by a review of the rules prior to the

Telecommunications Act. The ownership rules were once based on the level of audience reach, rather than a numerical limitation. Therefore, at the time, it was reasonable that the Commission would focus on the principal community contours to gauge the number of stations in the market.

However, with the enactment of Section 202 of the Telecommunications Act, the Commission switched from considering the audience-reach of a licensee to only considering the total number of stations owned by the licensee. The method of measuring the relevant local radio market, though, did not change with it. As a result, rather than include only those stations that actively compete in the market, the rules permit the inclusion of all stations that intersect with any of the licensee's station's principal community coverage. (3.16 mV/m for FM, 5 mV/m for AM).

The result in the Orlando market is that Cox was able to count 72 stations that overlap or are encompassed by Cox's current stations. In fact, the radio market boundary for Cox's multiple ownership study spans nearly 145 miles from north to south, and 90 miles from east to west. Many of the stations that overlap with the radio market boundary do not actively compete in the Orlando market, including local stations licensed to Ocala, Florida, almost 80 miles to the north, and local stations licensed to Melbourne, Florida, 75 miles south of Orlando.

C. The Effect of the Current Rules on the Local Radio Market.

Since the rules for determining the relevant market did not change at the same time as when the numerical limitation on the number of stations one licensee can own in a local radio market increased, competition and diversity in the local radio markets has suffered. In Orlando, of the 18 viable radio stations, 17 of the stations are owned by three licensees. Indeed, these three owners control 95% of the advertising revenue in the market, with Gross controlling the remaining 5% of the revenue in the market.

Nation-wide, according to the Commission's Review of the Radio Industry, 1997, released on March 13, 1998, "the top four radio owners generally account for about 90 percent of their Metro market's total revenues." Id. pg. 10. This analysis is supported by the Commission's examination of the Herfindahl-Hirschman Index ("HHI"),[3/] whereby the Commission stated that "there was a general trend towards increased economic concentration across Metro markets." Id. pg. 8-9. In fact, the Commission noted that the level of concentration has increased more in the smaller markets. Id.

Thus, the Commission must revise its rules to eliminate any further consolidation of the radio markets. As discussed below, the Commission and the Supreme Court have recognized the dangers of a concentrated local radio market, and previously have taken steps to

---

[3/] The HHI adds together the square of each competitor's market share. In a market with a HHI over 1800, an increase of over 100 points raises serious antitrust concerns in the proposed transaction. See Revised Merger Guidelines, § 2.17(c), Department of Justice and Federal Trade Commission (April 2, 1992).

eliminate this risk. Once again, the Commission must step in to modify those rules that allow for this concentration.

III. THE COMMISSION MUST ADOPT A RULE THAT ACCURATELY REFLECTS THE COMPETITIVE ECONOMIC RADIO MARKET.

A. The Commission has an obligation to ensure that the local radio markets are competitive.

Since the early days of the federal government's regulation of radio, the local broadcaster has been seen as a vital source of local information. Indeed, in 1928, the Federal Radio Commission, the predecessor to the FCC, referred to the local radio station as the "mouthpiece on the air for the community it serves."[4/]

To ensure that the local mouthpiece would continue to serve its community, the Communications Act of 1934 contained two specific provisions to ensure continued competition and diversity of ownership. Section 309(b) of the Communications Act of 1934 requires the Commission to make the finding that a proposed transaction will serve the public interest, convenience and necessity prior to its grant. 47 U.S.C. § 309(b) (1996). Furthermore, Section 313(a) of the Act applies to the communications industry "all laws of the United States relating to unlawful restraints and monopolies and to combinations, contracts or agreements in restraint of trade." 47 U.S.C. § 313(a) (1996).

[4/] Great Lakes Broadcasting Co., Federal Radio Commission, Third Annual Report, pp. 32-6 (1928). See also Federal Communications Commission, Report on Chain Broadcasting, pg. 64 (1941).

The Commission acknowledged this dual responsibility under the Communications Act.[5/] While the Commission has relied to some extent upon the findings of the Department of Justice, at the same time, it has recognized that it must also protect "competition in the broadcast markets."[6/] Additionally, the Commission stated that its "examination of a proposed merger under the public interest standard includes consideration of the competition policies underlying the Sherman and Clayton Acts."[7/] Thus, the public interest standard necessarily "subsumes and extends beyond the traditional parameters of review under the antitrust laws." Id.

Most recently, the NOI in this proceeding clearly stated that the Commission's

> "diversity concerns are separate from [its] goal of promoting competition. Indeed, the Supreme Court has recently stated that '[f]ederal policy...has long favored preserving a multiplicity of broadcast outlets regardless of whether the conduct that threatens it is motivated by

---

[5/] National Broadcasting Company v. U.S., 309 U.S. 109, 223-24 (1943) (quoting the Report on Chain Broadcasting (rel. May 2, 1941) ("The prohibitions of the Sherman Act apply to broadcasting."); See also Federal Communications Commission v. RCA Communications, Inc., 346 U.S. 86, 94 (1953) (stating that "[t]here can be no doubt that competition is a relevant factor in weighing the public interest.").

[6/] See NewCity Communications, Inc., 12 FCC Rcd 3929 ¶ 34 (1997) (citing Shareholders of Citicasters, Inc., 11 FCC Rcd 19135 (1996)).

[7/] NYNEX Corporation, 9 Comm. Reg. (P&F) 187, ¶ 2 (1997). To approve a merger, the Commission stated that an applicant must satisfy the burden of showing that the pro-competitive benefits outweigh the harm to competition. Id. If the burden is not met, the Commission "must either deny the application or designate it for hearing as to the material issues of fact." Id. ¶ 30.

anticompetitive animus or rises to the level of an antitrust violation.'"[8/]

Thus, the Commission has a clear obligation to review its rules, and make necessary modifications, if it determines that the current rules lead to the further consolidation of the radio market.

B. The Foregoing Proposal will Ensure that the Local Radio Markets Remain Competitive.

From this discussion, there should be little doubt that the current rules do not serve the public interest, and, in fact, encourage the consolidation of the local radio markets.

As such, Gross strongly urges the Commission to modify its multiple ownership rules, § 73.3555(d)(ii), to limit the inclusion of only those stations that place a 1 mV/m (FM) or 2 mV/m (AM) primary service contour over the furthest city limit of the market's principal city.[9/]

The use of these signal contours to establish the relevant local market rests on the fact that these contours represent the provision of a protected signal to its community. As such, these contours best identify those stations that realistically compete for revenue in the local radio market.

On the other hand, the proposal eliminates those stations that do not provide a clear signal to the community, and will not be

---

[8/] Notice of Inquiry, ¶ 4 (citing Turner Broadcasting System, Inc. v. FCC, 117 S.Ct. 1174 (1997).

[9/] If the current market has two principal cities, i.e. Minneapolis-St. Paul, then the primary service contour only needs to encompass one of the principal cities.

relied upon by an advertiser to serve the local market. Furthermore, this method eliminates the inclusion of the those stations that do not participate in the local market, and currently are included only due to their overlap with a powerful station under the common ownership of the licensee.

Thus, the proposed rule will best serve the public interest by including only those stations that are viable competitors in the local radio market. For example, if the proposed rules had been in place prior to the filing of Cox's pending application, 40 stations would have been excluded from its Multiple Ownership Study, reducing the total number from 72 stations, to a far more reasonable 32 stations. See Exhibit 3.

While this is still more than the actual viable stations in the market, the use of the proposed method more accurately indicates the number of relevant stations in the local radio market. Therefore, at the very least, the Commission should modify its rules to limit the number of stations in a local radio market to those station that place a protected contour over the principal's city limits.

C. One Further Modification will Ensure that the Commission Accurately Predicts the Local Market's Participants.

The Commission should also consider adopting an additional rule which limits the consideration of the number of AM stations in the market. Since, under the proposal, the main focus of the multiple ownership rules will be based on the actual competitors in the market, the Commission should also limit the number of AM stations to one-fourth the number of FM stations in the local market.

Currently, nearly 80% of the listenership of radio is of FM stations. That means for every 100 minutes of time each person listens to the radio, only 20 minutes is spent listening to AM stations. As such, even though there may be an equal number of AM and FM stations that place a primary signal contour over the city of license, the Commission should only consider a maximum of one-fourth of total number of FM stations when counting the AM stations.

For example, should there be 24 stations (12 AM and 12 FM stations) in a market that complies with the proposed rules, the consideration of all 12 AM stations would not accurately reflect the number of AM stations that compete in the market. Instead, the Commission should only consider one-fourth of the total number of FM stations, i.e. 3 AM stations. However, if there were 12 stations in a market, 10 of which are FM stations, the Commission would consider both AM stations, since the total number is less than one-fourth the number of FM stations.

Considering the current Orlando market, there are 19 FM stations, and 13 AM stations that place a primary service contour over the Orlando city limits. However, BIA, Duncan, and Miller, Kaplan estimate that the actual number of viable stations is smaller. Under the proposed plan, since there are 19 FM stations, the total number of AM stations to be considered for the multiple ownership study would be four stations. As such, the total number of viable radio stations competing in the Orlando radio market would be 22 stations, which closely corresponds with the figures from the market researchers.

Thus, the additional rule accurately reflects the number of AM stations that are viable competitors in a local radio market. Although in several cities, i.e. San Francisco, the level of listenership on AM stations may be higher than 20%, the Commission must adopt a single rule that can be applied throughout the country, which reflects the national average.

IV. CONCLUSION

Therefore, the Commission must seriously reconsider the method by which it measures the local radio market. Rather than accurately predict the relevant number of stations in the market, the current methodology includes numerous stations that do not actually compete in the market.

The proposed rule suggests a simple method to ascertain the true number of competing stations in a market. Furthermore, it reflects the awareness that AM stations do not have the same competitive share of the market as FM stations, and thus, make the necessary accommodations.

In light of these consideration, the Commission is hereby respectfully requested to seriously consider the proposed rules, and issue a Notice of Proposed Rulemaking based on these rules, so that a full record may be developed.

Respectfully submitted,

GROSS COMMUNICATIONS CORPORATION

By _____

John B. Gross
Its Vice President and
Chief Operating Officer

WLOQ FM Radio
170 W. Fairbanks Ave., #200
Winter Park, FL 32789
(407) 647-5557

July 21, 1998

Exhibit 1

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
WASHINGTON, DC

ENGINEERING EXHIBIT
IN SUPPORT OF APPLICATION FOR
ASSIGNMENT OF LICENSE
COX RADIO, INC.
APOPKA, FLORIDA

ENGINEERING STATEMENT

INTRODUCTION

This Engineering Statement has been prepared on behalf of Cox Radio, Inc. (Cox) in support of an application to the Federal Communications Commission (FCC) requesting consent to the assignment of the license of FM station WTLN-FM, Apopka, Florida. Cox also controls commercial television station WFTV, Orlando; AM broadcast stations WDBO and WHOO, Orlando; and FM broadcast stations WWKA, WHTQ, WMMO, Orlando, and WCFB, Daytona Beach, all Florida. The purpose of this Engineering Exhibit is to provide data pertinent to the multiple ownership aspects of the Cox assignment application.

STATION FACILITIES

WFTV is licensed (FCC File Number BLCT-810910KF) to operate on channel 9 (186-192 megahertz (MHz)) with maximum peak visual effective

Radio Ownership Rules

Figure 2 of this Engineering Exhibit is a portion of the Florida USGS 1:1,000,000-scale map showing the principal community contours[2] for WDBO, WHOO, WWKA, WHTQ, WMMO, WCFB and WTLN-FM together with the principal community contours for the other aural services with principal community contours overlapping those of the two AM and five FM stations proposed for common ownership by Cox. The principal community contours for the AM stations to be owned by Cox are shown in green. The principal community contours for the FM stations to be owned by Cox are shown in red. The principal community contours for other AM and FM stations providing principal community service within the radio market are shown in black and violet, respectively. Only the site locations for those aural services with sites enclosed by the WDBO/WHOO/WWKA/WHTQ/WMMO/WCFB/WTLN-FM radio market are shown on the map of Figure 2, as it is axiomatic that the principal community contours for the stations with enclosed sites overlap the principal community contours of the stations defining the radio market.

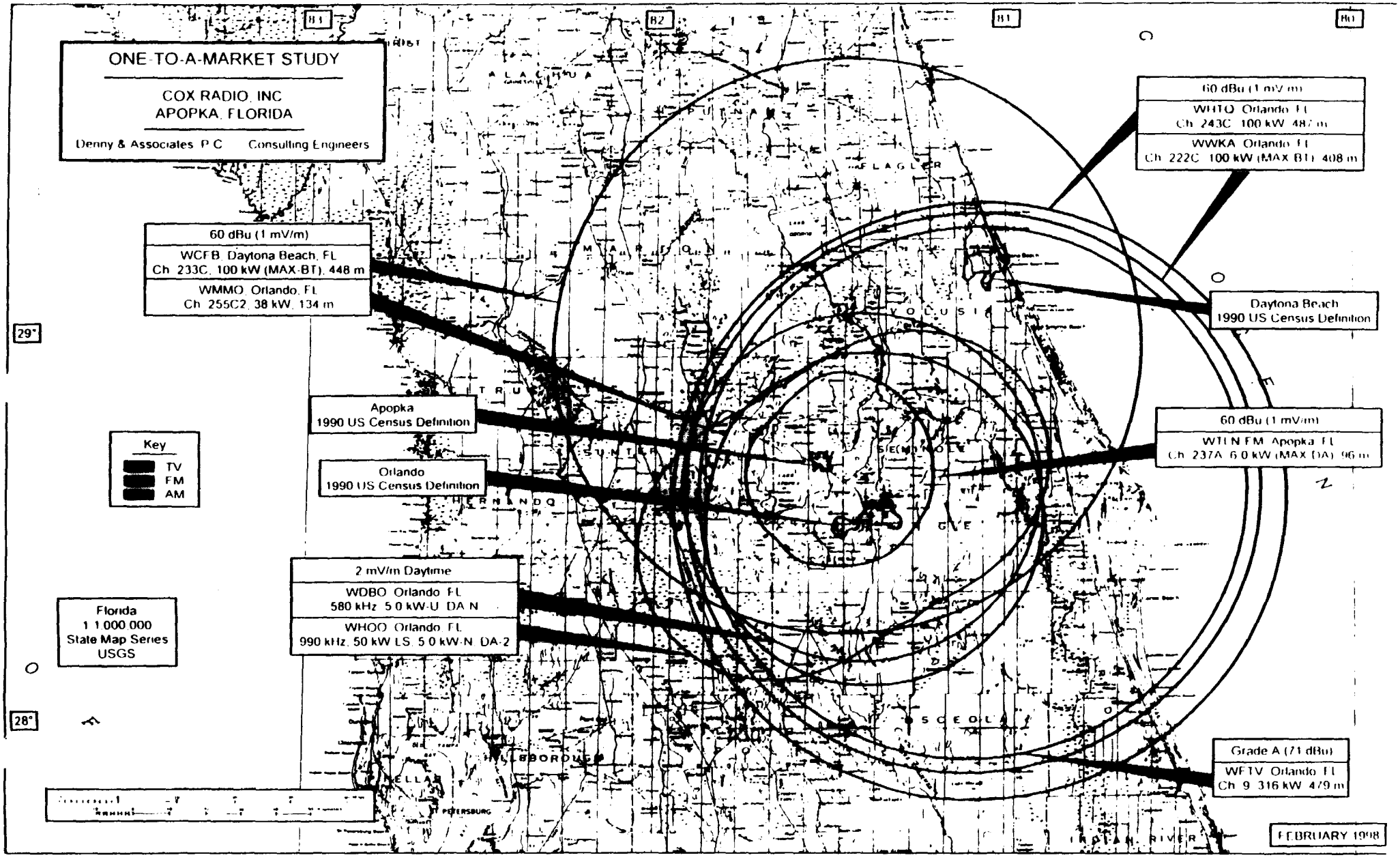
[2] The principal community contour for AM stations is the predicted daytime 5 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules, and for FM stations, it is the predicted 3.16 mV/m (70 dBμ) contour computed in accordance with Section 73.313 of the FCC Rules.

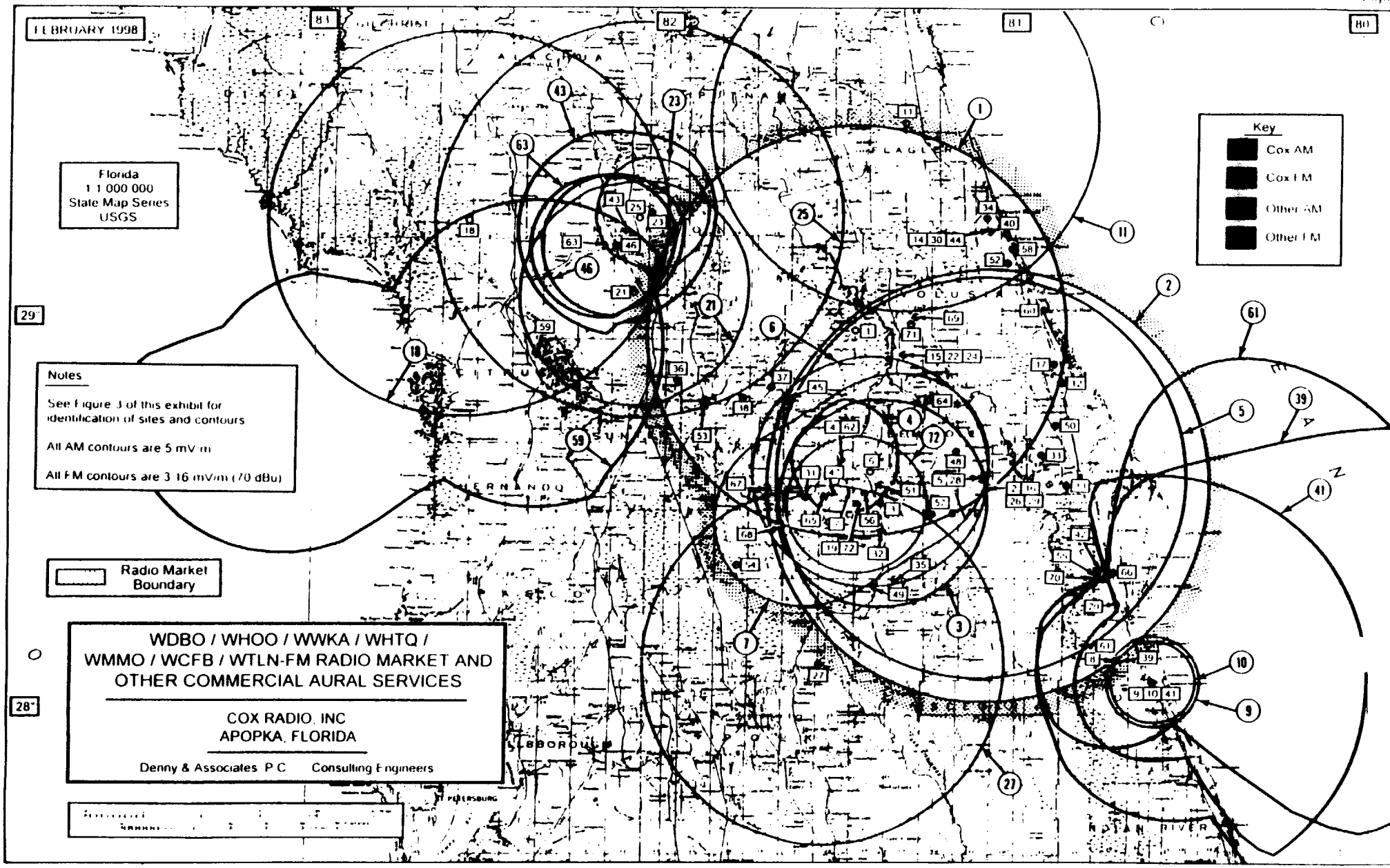
The contours and site locations shown on the map of Figure 2 of this exhibit are identified in the tabulation of Figure 3 of this exhibit. 72 commercial radio stations, 43 AM stations and 29 FM stations, provide principal community signal strength or better to all or part of the WDBO/WHOO/WWKA/WHTQ/WMMO/WCFB/WTLN-FM radio market. Section 73.3555(a)(1)(i) of the FCC Rules states that in a market of 45 or more commercial radio stations, a single entity may own, operate, or control up to eight radio stations not more than five of which are in the same aural service. Cox proposes to own a total of seven radio stations with no more than five in the same aural service.

Alan R. Rosner, P.E.

Subscribed and sworn to before me this 26th day of February, 1998.

Jennifer J. Mateik
Notary Public, District of Columbia
My commission expires June 30, 2001


ONE-TO-A-MARKET STUDY
COX RADIO, INC
APOPKA, FLORIDA
Denny & Associates P.C. Consulting Engineers
60 dBu (1 mV/m)
WHTQ Orlando FL
Ch. 243C, 100 kW, 487 m
WWKA Orlando FL
Ch. 222C, 100 kW (MAX-BT), 408 m
60 dBu (1 mV/m)
WCFB Daytona Beach, FL
Ch. 233C, 100 kW (MAX-BT), 448 m
WMMO Orlando, FL
Ch. 255C2, 38 kW, 134 m
Daytona Beach
1990 US Census Definition
Apopka
1990 US Census Definition
60 dBu (1 mV/m)
WTLN-FM Apopka FL
Ch. 237A, 6.0 kW (MAX DA), 96 m
Orlando
1990 US Census Definition
Key
TV
FM
AM
2 mV/m Daytime
WDBO Orlando FL
580 kHz, 5.0 kW-U, DA-N
WHOO Orlando FL
990 kHz, 50 kW-LS, 5.0 kW-N, DA-2
Florida
1:1,000,000
State Map Series
USGS
Grade A (71 dBu)
WFTV Orlando FL
Ch. 9, 316 kW, 479 m
FEBRUARY 1998
29°
28°
B1
B2
B1
B1


FEBRUARY 1998
Florida
1 1 000 000
State Map Series
USGS
Notes
See Figure 3 of this exhibit for identification of sites and contours
All AM contours are 5 mV/m
All FM contours are 3 16 mV/m (70 dBu)
Radio Market Boundary
WDBO / WHOO / WWKA / WHTQ / WMMO / WCFB / WTLN-FM RADIO MARKET AND OTHER COMMERCIAL AURAL SERVICES
COX RADIO, INC
APOPKA, FLORIDA
Denny & Associates P C Consulting Engineers
Key
Cox AM
Cox FM
Other AM
Other FM
81
82
80
29°
28°

ENGINEERING EXHIBIT
IN SUPPORT OF APPLICATION FOR
ASSIGNMENT OF LICENSE
COX RADIIO, INC.
APOPKA, FLORIDA

Identification of Station Contours

1. WCFB (FM), Daytona Beach, FL
   Ch. 233C, 100 kW(MAX- BT, H&V), 448 m
   28° 58′ 55″ NL; 81° 27′ 18″ WL

2. WHTQ (FM), Orlando, FL
   Ch. 243C, 100 kW (H&V), 487 m
   28° 34′ 51″ NL; 81° 04′ 32″ WL

3. WMMO (FM), Orlando, FL
   Ch. 255C2, 38 kW (H&V), 134 m
   28° 32′ 23″ NL; 81° 22′ 46″ WL

4. WTLN-FM, Apopka, FL
   Ch. 237A, 6.0 kW(MAX-DA, H&V), 96 m
   28° 39′ 08″ NL; 81° 29′ 40″ WL

5. WWKA (FM), Orlando, FL
   Ch. 222C, 100 kW (MAX-BT, H&V), 408 m
   28° 36′ 08″ NL; 81° 05′ 37″ WL

6. WDBO (AM), Orlando, FL
   580 kHz, 5.0 kW-U, DA-N
   28° 37′ 12″ NL; 81° 24′ 34″ WL

7. WHOO(AM), Orlando, FL
   990 kHz, 50 kW-LS, 5.0 kW-N, DA-2
   28° 34′ 28″ NL; 81° 27′ 48″ WL

8. WAOA (FM), Melbourne, FL
   Ch. 296C1, 100 kW (H&V), 148 m
   28° 08′ 14″ NL; 80° 42′ 11″ WL

9. WBVD (FM), Melbourne, FL
   Ch. 236A, 6.0 kW(H&V), 64 m
   28° 04′ 42″ NL; 80° 35′ 56″ WL

10. WCIF(FM), Melbourne, FL
    Ch. 292A, 4.2 kW (H&V), 64 m
    28° 04′ 40″ NL; 80° 35′ 55″ WL

11. WFKS (FM), Palatka, FL
    Ch. 260C, 100 kW (H&V), 366 m
    29° 31′ 08″ NL; 81° 19′ 02″ WL

12. WGNE-FM, Titusville, FL
    Ch. 251C1, 100 kW (H&V), 145 m
    28° 50′ 54″ NL; 80° 51′ 44″ WL

13. WHKR(FM), Rockledge, FL
    Ch. 274C2, 50.0 kW (H&V), 150 m
    28° 35′ 03″ NL; 80° 50′ 56″ WL

14. WHOG-FM, Ormond-By-The-Sea, FL
    Ch. 239C3, 25.0 kW (H&V), 100 m
    29° 14′ 10″ NL; 81° 04′ 23″ WL

Identification of Station Contours
Apopka, Florida

15. WJHM (FM), Daytona Beach, FL
Ch. 270C, 61 kW (MAX-BT, H&V), 483 m
28° 55′ 16″ NL; 81° 19′ 09″ WL

16. WJRR(FM), Cocoa Beach, FL
Ch. 266C, 100 kW (H&V), 487 m
28° 34′ 51″ NL; 81° 04′ 32″ WL

17. WKRO-FM, Edgewater, FL
Ch. 226C3, 15.0 kW (H&V), 130 m
28° 53′ 43″ NL; 80° 53′ 12″ WL

18. WHTK (FM), Crystal Rivers, FL
Ch. 253C, 100 kW (MAX-BT, H&V), 403 m
29° 15′ 32″ NL; 82° 34′ 03″ WL

19. WLOQ (FM), Winter Park, FL
Ch. 276C3, 14.0 kW (H&V), 134 m
28° 32′ 22″ NL; 81° 26′ 46″ WL

20. WLRQ-FM, Cocoa, FL
Ch. 257C2, 50 kW (H&V), 150 m
28° 16′ 42″ NL; 80° 42′ 03″ WL

21. WMFQ (FM), Ocala, FL
Ch. 225C2, 50 kW (H&V), 145 m
29° 04′ 45″ NL; 82° 05′ 35″ WL

22. WMGF (FM), Mount Dora, FL
Ch. 299C, 100 kW (H&V), 483 m
28° 55′ 16″ NL; 81° 19′ 09″ WL

23. WNDD, (FM) Silver Springs, FL
Ch. 238A, 6.0 kW (H&V), 100 m
29° 16′ 55″ NL; 82° 02′ 50″ WL

24. WOCL (FM), De Land, FL
Ch. 290C, 100 kW (MAX-BT, H&V), 482 m
28° 55′ 16″ NL; 81° 19′ 09″ WL

25. WOGK(FM), Ocala, FL
Ch. 229C, 100 kW (H&V), 411 m
29° 16′ 06″ NL; 82° 04′ 51″ WL

26. WOMX-FM, Orlando, FL
Ch. 286C, 100 kW (H&V), 487 m
28° 34′ 51″ NL; 81° 04′ 32″ WL

27. WPCV (FM), Winter Haven, FL
Ch. 248C, 100 kW (H&V), 310 m
28° 07′ 35″ NL; 81° 33′ 03″ WL

28. WSHE(FM), Orlando, FL
Ch. 262C, 100 kW (MAX-BT, H&V), 362 m
28° 36′ 08″ NL; 81° 05′ 37″ WL

29. WTKS(FM), Cocoa Beach, FL
Ch. 281C, 100 kW (H&V), 487 m
28° 34′ 51″ NL; 81° 04′ 32″ WL

30. WVYB(FM), Holly Hill, FL
Ch. 277A, 3.0 kW (H&V), 90 m
29° 14′ 10″ NL; 81° 04′ 23″ WL

31. WXXL(FM), Tavares, FL
Ch. 294C1, 100 kW (H&V), 251 m
28° 33′ 31″ NL; 81° 35′ 38″ WL

32. WAJL(AM), Pine Castle-Sky Lake, FL
1190 kHz, 5 kW-LS, ND
28° 27′ 58″ NL; 81° 22′ 30″ WL

33. WAMT(AM), Titusville, FL
1060 kHz, 10 kW-LS, 5 kW-N, DA-2
28° 39′ 47″ NL; 80° 55′ 17″ WL

34. WELE(AM), Ormond Beach, FL
1380 kHz, 5 kW-LS, 2.5 kW-N, DA-2
29° 16′ 09″ NL; 81° 04′ 54″ WL

Identification of Station Contours
Apopka, Florida

35. WFIV(AM), Kissimmee, FL
1080 kHz, 10 kW-LS, DA-D
28° 20′ 35″ NL; 81° 20′ 22″ WL

36. WHOF(AM), Wildwood, FL
640 kHz, 0.83 kW-LS, 0.98 kW-N, ND
28° 51′ 19″ NL; 81° 58′ 12″ WL

37. WKIQ(AM), Eustis, FL
1240 kHz, 0.79 kW-U, ND
28° 50′ 19″ NL; 81° 41′ 46″ WL

38. WLBE(AM), Leesburg-Eustis, FL
790 kHz, 5.0 kW-LS, 1.0 kW-N, DA-N
28° 49′ 00″ NL; 81° 46′ 45″ WL

39. WMEL(AM), Melbourne, FL
920 kHz, 5.0 kW-LS, 1.0 kW-N, DA-2
28° 08′ 11″ NL; 80° 41′ 20″ WL

40. WMFJ(AM), Daytona Beach, FL
1450 kHz, 1.0 kW-U, ND
29° 13′ 30″ NL; 81° 01′ 30″ WL

41. WMMB(AM), Melbourne, FL
1240 kHz, 1.0 kW-U, ND
28° 04′ 40″ NL; 80° 35′ 55″ WL

42. WMMV(AM), Cocoa, FL
1350 kHz, 1.0 kW-U, DA-N
28° 21′ 58″ NL; 80° 45′ 08″ WL

43. WMOP(AM), Ocala, FL
900 kHz, 2.7 kW-D, 0.023 kW-N, ND
29° 14′ 17″ NL; 82° 07′ 17″ WL

44. WNDB(AM), Daytona Beach, FL
1150 kHz, 1.0 kW-U, DA-N
29° 14′ 06″ NL; 81° 04′ 19″ WL

45. WNTF(AM), Mount Dora, FL
1580 kHz, 5.0 kW-LS, ND
28° 48′ 57″ NL; 81° 38′ 52″ WL

46. WOCA(AM), Ocala, FL
1370 kHz, 5.0 kW-D, 0.033 kW-LS, ND
29° 12′ 04″ NL; 82° 09′ 07″ WL

47. WOKB(AM), Winter Garden, FL
1600 kHz, 5.0 kW-U, DA-2
28° 34′ 06″ NL; 81° 31′ 09″ WL

48. WONQ(AM), Oviedo, FL
1030 kHz, 10 kW-D, 0.5 kW-N, DA-2
28° 40′ 31″ NL; 81° 10′ 01″ WL

49. WOTS(AM), Kissimmee, FL
1220 kHz, 1.0 kW-LS, 0.11 kW-N, ND
28° 19′ 27″ NL; 81° 23′ 44″ WL

50. WPGS(AM), Mims, FL
840 kHz, 0.25 kW-LS, ND
28° 44′ 17″ NL; 80° 52′ 52″ WL

51. WPRD(AM), Winter Park, FL
1440 kHz, 5.0 kW-LS, 1 kW-N, DA-N
28° 35′ 18″ NL; 81° 22′ 53″ WL

52. WPUL(AM), South Daytona, FL
1590 kHz, 1.0 kW-LS, 0.032 kW-N, ND
29° 09′ 16″ NL; 81° 01′ 20″ WL

53. WQBQ(AM), Leesburg, FL
1410 kHz, 5.0 kW-LS, 0.090 kW-N, ND
28° 47′ 13″ NL; 81° 53′ 26″ WL

54. WQTM(AM), Pine Hills, FL
540 kHz, 50 kW-U, DA-2
28° 22′ 52″ NL; 81° 47′ 31″ WL

Identification of Station Contours
Apopka, Florida

55. WRFB(AM), Cocoa, FL
860 kHz, 1.0 kW-D, 0.121 kW-LS, ND
28° 21′ 12″ NL; 80° 46′ 45″ WL

56. WRLZ(AM), Eatonville, FL
1270 kHz, 5.0 kW-U, DA-N
28° 34′ 03″ NL; 81° 25′ 38″ WL

57. WRMQ(AM), Orlando, FL
1140 kHz, 4.1 kW-LS, ND
28° 30′ 42″ NL; 81° 14′ 09″ WL

58. WROD(AM), Daytona Beach, FL
1340 kHz, 1.0 kW-U, ND
29° 11′ 19″ NL; 81° 00′ 28″ WL

59. WRZN(AM), Hernando, FL
720 kHz, 1.0 kW-LS, 0.25 kW-N, DA-N
28° 55′ 21″ NL; 82° 22′ 21″ WL

60. WSBB(AM), New Smyrna Beach, FL
1230 kHz, 1.0 kW-U, ND
29° 01′ 57″ NL; 80° 55′ 03″ WL

61. WTMS(AM), Melbourne, FL
1560 kHz, 5.0 kW-LS, ND
28° 07′ 40″ NL; 80° 42′ 29″ WL

62. WTLN(AM), Apopka, FL
1520 kHz, 5.0 kW-LS, DA-D
28° 39′ 08″ NL; 81° 29′ 40″ WL

63. WTMC(AM), Ocala, FL
1290 kHz, 5.0 kW-D, 1.0 kW-N, DA-N
29° 11′ 51″ NL; 82° 10′ 57″ WL

64. WTRR(AM), Sanford, FL
1400 kHz, 1.0 kW-U, ND
28° 48′ 04″ NL; 81° 15′ 06″ WL

65. WUNA(AM), Ocoee, FL
1480 kHz, 1.0 kW-LS, 0.071 kW-N, ND
28° 33′ 27″ NL; 81° 32′ 29″ WL

66. WWBC(AM), Cocoa, FL
1510 kHz, 1.0 kW-LS, ND
28° 21′ 30″ NL; 80° 42′ 38″ WL

67. WWFL(AM), Clermont, FL
1340 kHz, 1.0 kW-U, ND
28° 34′ 59″ NL; 81° 42′ 19″ WL

68. WWNZ(AM), Orlando, FL
740 kHz, 50 kW-U, DA-2
28° 28′ 53″ NL; 81° 39′ 43″ WL

69. WXVQ(AM), De Land, FL
1490 kHz, 1.0 kW-U, ND
29° 00′ 58″ NL; 81° 17′ 10″ WL

70. WXXU(AM), Cocoa Beach, FL
1300 kHz, 5.0 kW-LS, 1.0 kW-N, DA-2
28° 20′ 38″ NL; 80° 46′ 06″ WL

71. WYND(AM), De Land, FL
1310 kHz, 5.0 kW-LS, 0.095 kW-N, ND
28° 59′ 57″ NL; 81° 17′ 55″ WL

72. WZKD(AM), Orlando, FL
950 kHz, 5.0 kW-U, DA-N
28° 32′ 08″ NL; 81° 26′ 55″ WL

Exhibit 2